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6      *and GREAT LAKES EDUCATIONAL LOAN*  
6      *SERVICES*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

10 | AMANDA GATES,

**Plaintiff,**

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EQUIFAX INFORMATION SERVICES,  
LLC; NAVIENT; NELNET LOAN  
SERVICES; GREAT LAKES  
EDUCATIONAL LOAN SERVICES;  
TRANS UNION LLC; AND U.S.  
BANKCORP.

1

### Defendants.

CASE NO.: 2:19-cv-01710-APG-VCF

**JOINT MOTION AND ORDER  
EXTENDING DEFENDANTS NELNET  
LOAN SERVICES AND GREAT LAKES  
EDUCATIONAL LOAN SERVICE'S  
TIME TO FILE AN ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

18 Plaintiff AMANDA GATES (“Plaintiff”) and Defendants NELNET LOAN SERVICES  
19 and GREAT LAKES EDUCATIONAL SERVICES (“Nelnet Defendants”), by and through their  
20 respective counsel, file this Joint Motion Extending Nelnet Defendants’ Time to File an Answer  
21 or Otherwise Respond to Plaintiff’s Complaint.

22 On October 1, 2019, Plaintiff filed her Complaint. The current deadlines for the Nelnet  
23 Defendants to answer or otherwise respond to Plaintiff's Complaint are October 25, 2019 and  
24 November 7, 2019. The claims at issue necessitate additional time for fact-finding. Further, the  
25 Nelnet Defendants are in the process of acquiring and reviewing all relevant documents so they  
26 can meaningfully respond to the specific allegations contained in Plaintiff's Complaint.  
27 Moreover, undersigned counsel was just retained by the Nelnet Defendants in this action, and  
28 therefore requires additional time to investigate the allegations and claims asserted against the

1 Nelnet Defendants. Plaintiff has no opposition to Nelnet Defendants' request for an extension  
2 until November 15, 2019, to file an answer or otherwise respond to Plaintiff's Complaint.

3 The parties submit that this is the first joint motion for extension of time for Nelnet  
4 Defendants to respond to Plaintiff's Complaint, the request is not brought for purpose of delay,  
5 and good cause exists for granting the same.<sup>1</sup>

6 DATED this 4th day of November, 2019.

7  
8 BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

9 By: /s/ Emily A. Ellis  
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25 KNEPPER & CLARK LLC

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Attorneys for Plaintiff AMANDA GATES

28 <sup>1</sup> A Proposed Order granting the motion is attached hereto as Exhibit A.

**CERTIFICATE OF SERVICE**

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **JOINT MOTION AND [PROPOSED] ORDER EXTENDING DEFENDANTS NELNET LOAN SERVICES and GREAT LAKES EDUCATIONAL LOAN SERVICE'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** was served via electronic service on the 4th day of November, 2019, and to the addresses shown below:

<p>Jennifer R. Bergh, Esq.  <b>QUILLING SELANDER LOWNDS</b>  <b>WINSLETT &amp; MOSER, P.C.</b>  6900 N. Dallas Parkway, Suite 800  Plano, TX 75024  Email: <a href="mailto:jbergh@qslwm.com">jbergh@qslwm.com</a></p> <p><i>Counsel for Defendant Trans Union LLC</i></p>	<p>Trevor Waite, Esq.  <b>ALVERSON TAYLOR &amp; SANDERS</b>  6605 Grand Montecito Parkway, Suite 200  Las Vegas, NV 89149  Email: <a href="mailto:twaite@alversontaylor.com">twaite@alversontaylor.com</a></p> <p><i>Designated Attorney for Personal Service for Counsel for Trans Union LLC</i></p>
<p>David H. Krieger, Esq.  <b>HAINES &amp; KRIEGER, LLC</b>  8985 S. Eastern Ave., Suite 350  Henderson, NV 89123  Email: <a href="mailto:dkrieger@hainesandkrieger.com">dkrieger@hainesandkrieger.com</a></p> <p><i>Attorneys for Plaintiff Amanda Gates</i></p>	<p>Matthew I. Knepper, Esq.  Miles N. Clark, Esq.  <b>KNEPPER &amp; CLARK LLC</b>  5510 S. Fort Apache Road, Suite 30  Las Vegas, NV 89148  Emails:  <a href="mailto:matthew.knepper@knepperclark.com">matthew.knepper@knepperclark.com</a>  <a href="mailto:miles.clark@knepperclark.com">miles.clark@knepperclark.com</a></p> <p><i>Attorneys for Plaintiff Amanda Gates</i></p>
<p>Michael R. Ayers, Esq.  <b>HOLLEY, DRIGGS, WALCH, FINE,</b>  <b>PUZEY, STEIN &amp; THOMPSON</b>  800 S. Meadow Parkway, Suite 800  Reno, NV 89521  Email: <a href="mailto:mayers@nevadafirm.com">mayers@nevadafirm.com</a></p> <p><i>Attorneys for Defendant Navient Solutions, LLC</i></p>	<p>Jeremy J. Johnson, Esq.  <b>CLARK HILL PLLC</b>  3800 Howard Hughes Parkway, Suite 500  Las Vegas, NV 89169  Email: <a href="mailto:jthompson@clarkhill.com">jthompson@clarkhill.com</a></p> <p><i>Attorneys for Defendant Equifax Information Services, LLC</i></p>

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8                   *Attorneys for Defendant U.S. BankCorp*

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11                 */s/ Paula Kay*  
12                 an employee of Brownstein Hyatt Farber Schreck, LLP  
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1                           **INDEX OF EXHIBITS**

2                           **EXHIBIT A:** [Proposed] Order

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# **EXHIBIT A**

## **[PROPOSED] ORDER**

AMANDA GATES,

**Plaintiff,**

V.

EQUIFAX INFORMATION SERVICES,  
LLC; NAVIENT; NELNET LOAN  
SERVICES; GREAT LAKES  
EDUCATIONAL LOAN SERVICES;  
TRANS UNION LLC; AND U.S.  
BANKCORP,

### Defendants.

CASE NO.: 2:19-cv-01710-APG-VCF

**ORDER RE JOINT MOTION  
EXTENDING DEFENDANTS NELNET  
LOAN SERVICES AND GREAT LAKES  
EDUCATIONAL LOAN SERVICE'S  
TIME TO FILE AN ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

1 The Court having considered the Joint Motion Extending Defendants Nelnet Loan  
2 Services and Great Lakes Educational Loan Service's Time to File an Answer or Otherwise  
3 Respond to Plaintiff's Complaint (First Request) ("Joint Motion for Extension of Time"), finds as  
4 follows:

5 IT IS HEREBY ORDERED that the Joint Motion for Extension of Time is GRANTED.

IT IS FURTHER ORDERED that Defendants Nelnet Loan Services and Great Lakes Educational Loan Service shall have up to and including November 15, 2019, to respond to Plaintiff's Complaint.

9 || DATED this 6th day of November, 2019

*Carl Gaddis*

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**CAM FERENBACH**  
**UNITED STATES MAGISTRATE JUDGE**